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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LARRY BOWOTO, et. al.,

Plaintiffs,

v.

CHEVRON CORPORATION, et al.

Defendants.

Case No: C 99-02506 SI

JOINT STIPULATION AND
[PROPOSED] ORDER RE: HEARING
DATE

Assigned to the Honorable
Susan Illston
Courtroom #4, 19th Floor
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(continued from first page)

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JOINT STIPULATION AND [PROPOSED] ORDER RE: HEARING DATES

Whereas, the hearing on (a) Plaintiffs' Motion for Summary Adjudication of Defendants' Affirmative Defense Raising the Act of State Doctrine and (b) Defendants' Renewed Motion for the Court to Request the Views of the United States on the Impact of Adjudication of this Lawsuit on Foreign Relations with Nigeria is currently set to be heard in this Court on February 3, 2006; and

Whereas, as part of Defendants' Opposition to Plaintiffs' Motion for Summary Adjudication, Defendants submitted a Cross-Motion for Summary Judgment on the Act of State Doctrine and noticed that Motion for February 3, 2006; and

Whereas, Plaintiffs believe they are entitled to more than one week to respond to Defendants' Cross Motion and Defendants have agreed to afford Plaintiffs additional time to respond; and

Whereas, the Plaintiffs and Defendants agree that, in the interests of judicial economy all of these motions should be heard together,

The Plaintiffs and Defendants hereby jointly stipulate that:

1. Argument will be set for March 3, 2006 at 9:00 A.M. on (a) Plaintiffs' Motion for Summary Adjudication of Defendants' Affirmative Defense Raising the Act of State Doctrine (b) Defendants' Cross-Motion for Summary Judgment on the Act of State Doctrine and (c) Defendants' Renewed Motion for the Court to Request the Views of the United States on the Impact of Adjudication of this Lawsuit on Foreign Relations with Nigeria.

2. Plaintiffs will submit their Reply in Support of their Motion for Summary Adjudication/Opposition to Defendants Motion for Summary Judgment on February 3, 2006.

3. Defendants will submit their Reply in Support of their Motion to Request the Views of the United States on February 3, 2006.

4. Defendants will submit their Reply in Support of their Cross Motion for Summary Judgment on February 17, 2006.

1 Dated: January 20, 2006

Respectfully submitted,

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3
4 By /s/ _____
5 Richard Herz

6 EarthRights International
7 Attorneys for Plaintiffs

8
9 By /s/ _____
10 Caroline Mitchell

11 JONES DAY
12 Attorneys for Defendants

13 It is so ordered.

14 January , 2006

